

EXHIBIT 1

KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

200 East Randolph Drive
Chicago, Illinois 60601

Rachel Pernic Waldron
To Call Writer Directly:
312 861-3371
rpernicwaldron@kirkland.com

312 861-2000
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312 861-2200
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June 19, 2006

VIA EMAIL

Daniel J. Goettle, Esq.
Woodcock Washburn LLP
One Liberty Place, 46th Floor
Philadelphia, PA 19103

Re: *TruePosition v. Andrew Corp.*, Civil Action No. 05-00747-SLR

Dear Dan:

Thank you for your two letters of June 15; I write regarding the outstanding issues.

State Secrets Objection

Source Code

Andrew will produce OCR text extractions of all source code that has been, or will be, produced to TruePosition, which will allow TruePosition to search the source code.

London

Los Angeles

Munich

New York

San Francisco

Washington, D.C.

Daniel J. Goettle, Esq.
June 19, 2006
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Request No. 5, 6, and 65

We appreciate your proposals, but object to the phrases “a business combination involving Andrew or any other entity” (No. 5) and “business combination” (No. 65) as vague, ambiguous, and confusing.

Andrew will accept Nos. 6 and 65 — which both request documents related to the ‘192 patent — on the condition that TruePosition produce documents in response to Andrew’s Document Request No. 12 — which also requests documents related to the ‘192 patent — as proposed in my letter of June 15.

Request Nos. 66-67

Andrew accepts the proposed document requests contained in your letter; thank you for your proposals.

Financial Summaries

Andrew is amenable to producing financial summaries, and believes the parties should work together on the details of what the summaries should include.

Please let me know if you have any questions.

Very truly yours,

/s/ Rachel Pernic Waldron

Rachel Pernic Waldron

EXHIBIT 2



INTELLECTUAL PROPERTY LAW
ATLANTA • PHILADELPHIA • SEATTLE

PHILADELPHIA OFFICE
One Liberty Place, 46th Floor
Philadelphia, PA 19103
215-568-3100
Fax: 215-568-3439

DANIEL J. GOETTLE
215-564-8974
goettle@woodcock.com

June 20, 2006

Rachel Pernic Waldron, Esq.
Kirkland & Ellis LLP
200 East Randolph Drive
Chicago, IL 60601

Re: *TruePosition, Inc. v. Andrew Corp.* (D.Del. 05-747)

Dear Rachel:

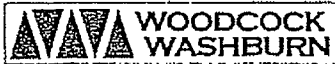
Thank you for your correspondence dated June 19, 2006.

Source Code

While we appreciate Andrew's offer to produce OCR text extractions, such extractions, by themselves, provide TruePosition with no information about the hierarchical structure of the code, what routines or files within the code are actually called, or the circumstances under which such calls occur or do not occur. TruePosition therefore will ask Chief Judge Robinson to institute her Default Procedure For Access to Source Code for each version of the Geometrix Software that supports UTDOA geolocation on a control channel.

Requests 5, 6 and 65

Andrew's vague, ambiguous, and confusing objections to the phrases "a business combination involving Andrew or any other entity" and "business combination" are baseless. There is no plausible basis for Andrew to claim it does not understand what the phrase business combination means. Business means "a commercial enterprise," and combination means "a result or product of combining, especially an alliance of corporations to achieve an economic



Rachel Pernic Waldron, Esq.
June 20, 2006
Page 2

end." See Merriam-Webster's. Please confirm that Andrew will produce each non-privileged document responsive to the significantly narrowed request 5 contained in my June 15, 2006 correspondence, which I set forth below for your convenience:

"Each document, created on or after January 1, 2004, that refers to, directly relates to, or comments on TruePosition and: the '144 Patent, standardizing UTDOA geolocation, ETSI, 3GPP, ETSI or 3GPP IPR policies, interpreting or interpretations of ETSI or 3GPP IPR policies, declaring or notifying ETSI or 3GPP of IPRs, or Essential IPRs under ETSI or 3GPP IPR Policies, STC, the STC RFP, Andrew's contract with STC, any other Andrew customer or potential customer of geolocation technology involving or including UTDOA on a control channel, marketing of geolocation technology involving UTDOA on a control channel, 'blocking' patents, a business combination involving Andrew or any other entity, or the value of TruePosition."

Regarding requests 6 and 65, in separate correspondence TruePosition agrees to produce each non-privileged document that is responsive to Andrew's request 12 as originally served. We therefore accept your proposal regarding TruePosition requests 6 and 65. To avoid any ambiguity, we now understand that Andrew will produce each non-privileged document that is responsive to the following narrowed requests:

6. "Each document, created on or after January 1, 2000, that refers to, directly relates to, comments on, or embodies any communication between Andrew and TruePosition which refers to, directly relates to, or comments on the 144 Patent, U.S. Patent No. 6,047,192, standardizing UTDOA geolocation, ETSI, 3GPP, ETSI or 3GPP IPR policies, interpreting or interpretations of ETSI or 3GPP IPR policies, declaring or notifying ETSI or 3GPP of IPRs, or Essential IPRs under ETSI or 3GPP IPR Policies"; and

65. "Each document, created on or after January 1, 2004, that refers to, directly relates to, comments on, or embodies any communication between Andrew and TruePosition regarding geolocation technology involving or including UTDOA on a control channel, any business combination, the '144 patent, the '192 patent, "blocking" patents, standardizing UTDOA geolocation involving or including UTDOA on a control channel, ETSI, 3GPP, ETSI or 3GPP IPR policies, interpreting or interpretations of ETSI or 3GPP IPR policies, declaring or notifying ETSI or 3GPP of IPRs or



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June 20, 2006
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Essential IPRs under ETSI or 3GPP IPR Policies, STC, the STC RFP,
Andrew's contract with STC, or the value of or any valuation of
TruePosition.

Sincerely,

/s/ Daniel J. Goettle

Daniel J. Goettle

DJG

Cc: Michael A. Parks, Esq.
Josy W. Ingersoll, Esq.
James D. Heisman, Esq.

EXHIBIT 3

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|---------------------|---|--------------|
| TRUEPOSITION, INC. |) | Civil Action |
| |) | |
| Plaintiff, |) | No. 05-747 |
| |) | |
| vs. |) | |
| |) | |
| ANDREW CORPORATION, |) | |
| |) | |
| Defendant. |) | |

VIDEOTAPED DEPOSITION OF
ANDREW BECK
Reston, Virginia
Friday, September 22, 2006
9:05 a.m.

Job No.: 22-87165

Pages 1 through 318

Reported by: John L. Harmonson, RPR, CCR

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EXHIBIT 4

EXHIBIT 5



Rachel Pernic
Waldron/Chicago/Kirkland-Elli
s

01/14/2007 07:33 PM

To dgoettle@woodcock.com
cc mparks@kirkland.com
bcc
Subject

Dan —

TruePosition previously asked for proof that Andrew has classified contracts with the government;
attached to this email is a redacted contract excerpt giving such proof.

Thank you,
Rachel



Contract.pdf

Rachel Pernic Waldron
KIRKLAND & ELLIS LLP
200 E. Randolph Drive
Chicago, IL 60601
Phone: 312.861.3371
Fax: 312.861.2200

EXHIBIT 6

CONFIDENTIAL INFORMATION

AND0074109

- 2 -

CONFIDENTIAL INFORMATION

AND0074110

CONFIDENTIAL INFORMATION

AND0074111

CONFIDENTIAL INFORMATION

AND0074113

CONFIDENTIAL INFORMATION

AND0074114

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CONFIDENTIAL INFORMATION

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- 10 -

CONFIDENTIAL INFORMATION

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CONFIDENTIAL INFORMATION

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CONFIDENTIAL INFORMATION

AND0074121

CONFIDENTIAL INFORMATION

AND0074123

CONFIDENTIAL INFORMATION

AND0074124

EXHIBIT 7

CONFIDENTIAL INFORMATION

AND0074109

CONFIDENTIAL INFORMATION

AND0074110

CONFIDENTIAL INFORMATION

AND0074112

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